

PUBLIC VERSION

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October 19, 2018

By ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of Iowa Network Access Division Tariff F.C.C. No. 1, WC Docket No. 18-60, Transmittal No. 38 (Sept. 24, 2018 Revised Tariff Filing)*

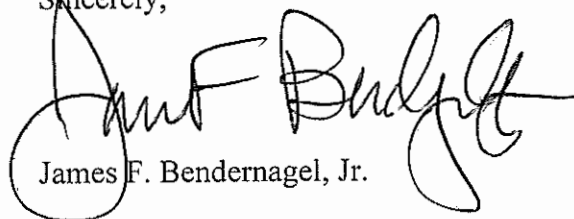
Dear Ms. Dortch:

AT&T Services, Inc. ("AT&T") submits for filing the **Public Version** of its *ex parte* submission, provided in response to Transmittal No. 38 filed on September 24, 2018 by Iowa Network Services, Inc. d/b/a Aureon Network Services ("Aureon"). Consistent with the Commission's rules and the March 26, 2018 Protective Order entered by the Commission Staff, AT&T has redacted all "Confidential Information" from the **Public Version**, which it is filing by ECFS.

AT&T is also filing by hand with the Secretary's office one hard copy of the **Confidential Version** of this submission. In addition, copies of all versions of the submission are being served electronically on Aureon's counsel. Two copies are also being provided to Joseph Price at the Wireline Competition Bureau.

Please contact me if you have any questions regarding this matter.

Sincerely,



James F. Bendernagel, Jr.

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Ex Parte Notice

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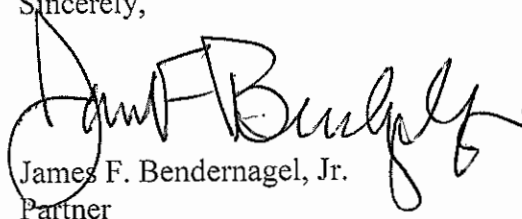
Re: *In the Matter of Iowa Network Access Division Tariff F.C.C. No. 1, WC Docket No. 18-60, Transmittal No. 38 (Sept. 24, 2018 Revised Tariff Filing)*

Dear Ms. Dortch:

On October 18, 2018, James Bendernagel of Sidley Austin, LLP, and Christi Shewman of AT&T, met with Lisa Hone, Pamela Arluk, Victoria Goldberg, Edward Krachmer, Al Lewis, Joseph Price, and Richard Kwiatkowski (telephonically) of the Wireline Competition Bureau.

The purpose of the meeting was to discuss the issues raised by Aureon's September 24, 2018 Tariff Filing and the types of documents and other material that would be needed to determine if Aureon's proposed rate for its centralized equal access ("CEA") service is just and reasonable and was properly calculated and supported under the requirements of Section 61.38. During the meeting, the attached materials relating to Aureon's September 24 Tariff Filing and its fiber optic network were discussed.

Sincerely,


James F. Bendernagel, Jr.
Partner

Cc: Lisa Hone
Pamela Arluk
Joseph Price
Victoria Goldberg
Al Lewis
Edward Krachmer
Richard Kwiatkowski

Attachment 1

Aureon Network Map

AUREON FIBER OPTIC NETWORK

Does your business have the speed and bandwidth to meet its needs today and tomorrow? Aureon™ offers a state-of-the-art fiber optic network with the speed, bandwidth, reliability, and performance to support all your business communication needs. Let Aureon keep you connected, so you can put your focus where it belongs—on your business.

The Aureon Fiber Optic Network is a part of **more than 5,500 miles of Iowa-owned, carrier-grade, redundant, self-healing, and symmetrical network delivering unmatched reliability with multiple points-of-presence throughout the state.** Every new mile we install is engineered and continuously monitored to provide industry-leading reliability and performance.

The self-healing Aureon Fiber Optic Network is equipped with SONET ring technology, which offers redundancy and protection from downtime for TDM transport.

Our packet delivery network provides connectivity to four national Tier 1 internet backbone providers, eliminating your need to connect to alternate providers. In addition, it's symmetrical so it provides equal upload and download speeds to move large amounts of data easily and securely. **All of it is monitored and supported 24/7 year-round by our network operations experts.**

The extensive Aureon Fiber Optic Network has an incredibly wide bandwidth capacity and is continuously updated with state-of-the-art technology. Your business benefits by receiving complete end-to-end connectivity through only one point of contact, rather than third-party suppliers who may be unfamiliar to you.

Aureon also offers flexible, reliable, and scalable services that support your business, including:

- Ethernet Transport (1 Mbps to 100 Gbps).
- TDM Transport (DS1, DS3, OC3, OC12, OC48, OC192).
- Internet Access (1 Mbps to 100 Gbps Ethernet).
- MPLS.
- Wavelength Services.

We have the bandwidth and services to support all your communications needs to remain competitive, today and in the future.

Aureon is also a member of INDATEL®, a national telecommunications services organization comprised of rural statewide fiber optic network providers who deliver best-in-class, cost-effective broadband transport connectivity across the country. Through INDATEL, **Aureon is able to deliver Ethernet connectivity via 90,000 miles of fiber deployed across the U.S.** with a strong focus on serving rural and underserved markets.

AUREON FIBER OPTIC NETWORK MAP



For more information on the benefits of the **Aureon Fiber Optic Network**, call 888-387-5670 or visit AureonTechnology.com.

Attachment 2

Questions for Staff

**CONFIDENTIAL
MATERIALS OMITTED**